

Page 1

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF VIRGINIA

CHRISTPHER BUSH AND DAVID BUSH

Plaintiff

v. Civil Action No. 07-4926

S.C. ADAMS, ET AL.

Defendants

Deposition of LIEUTENANT BRIAN RUSSELL,
taken at the instance of the Plaintiff, before
Mary E. Aliff, Court Reporter and Notary Public for
the State of Virginia at Large on May 20, 2010
commencing at 2:45 p.m. at the offices of the City
of Richmond City Attorney, 900 E. Broad Street,
Richmond, Virginia, pursuant to Rule 4:5 of the
Supreme Court Rules of Virginia, pursuant to notice.

Page 2

APPEARANCES:

Mr. Brian Puricelli, Esq.
Law Offices of Brian Puricelli
691 Washington Crossing Road
Newtown, PA 18904

on behalf of Plaintiff;

Mr. Nicholas Simopoulos, Esq.
Office of the City Attorney
900 East Board Street
Richmond, Virginia 23219

on behalf of Defendant.

I N D E X

DIRECT EXAMINATION

By Plaintiff pages 3 - 103

No Cross Examination

Exhibit No. 1 page 71

Eratta pages 105 - 108

Page 3

LIEUTENANT BRIAN RUSSELL

Being called as a witness by and on behalf of the
Plaintiff, being first duly sworn, as hereinafter
certified, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. PURICELLI:

Q Lieutenant Russell; correct?

A That's correct.

Q My name is Brian Puricelli. We're down
here for an action that is in the Eastern District
of Pennsylvania against the Pennsylvania State
Police. We're asking some question of a witness
status. Have you ever been deposed before?

A Yes.

Q Okay. You're familiar with the phrase
"usual stipulations?"

A No.

Q All right. Basically, it means I'm going
to ask you questions. Hopefully, you'll be able to
answer them. There are two objections that apply
here, one is privilege. Being I ask you a question
such as something you said to you doctor, your
priest or your lawyer goes to privilege. In those
cases we'll just move past them. And the form of
the questions generally means that your attorney

Page 4

believes that maybe the question is vague or needs
to be explained. If it has two different meanings
he wants to make sure that you understand the
question so that you're answering what I'm asking.

Aside from that you may hear other
objections but you'll answer those questions.
They're reserved for a decision by a judge later;
okay?

A Yes.

MR. PURICELLI: Anything you want to
instruct the witness on?

MR. SIMOPOULOS: No.

MR. PURICELLI: He knows about reading?

MR. SIMOPOULOS: You'll have the right to
read and sign your deposition and I will advise
that you do that.

THE WITNESS: Okay.

MR. PURICELLI: And that means, assuming
that your attorney is getting a copy, he will
meet with you and you'll look over it and any
mistypes -- I doubt that there will be -- can
be corrected by you.

An example would be maybe you used the
word butt and it comes up B-U-T and you meant
the butt of a gun or something and it's

Page 5	Page 7
<p>1 B-U-T-T. You can correct those things. You</p> <p>2 can't change an answer. If you said yes and</p> <p>3 you meant to say no, you can't change that.</p> <p>4 MR. SIMOPOULOS: We'll discuss that.</p> <p>5 BY MR. PURICELLI:</p> <p>6 Q Prior to coming here did you read anything</p> <p>7 to prepare for coming?</p> <p>8 A No.</p> <p>9 Q Have you had any discussions with anybody</p> <p>10 about coming here today other than your attorney?</p> <p>11 A No.</p> <p>12 Q Do you know why you've been asked to come</p> <p>13 and visit with us today?</p> <p>14 A Yes.</p> <p>15 Q So I don't need to go into the history of</p> <p>16 the case?</p> <p>17 A No.</p> <p>18 Q All right. It's our understanding that at</p> <p>19 some point in time you became involved in an</p> <p>20 allegation that the Bush children were improperly</p> <p>21 taken from Virginia. You understand that?</p> <p>22 A Yes.</p> <p>23 Q Okay. Can you tell me when it is you</p> <p>24 first became involved with any part of the arrest of</p> <p>25 David Bush?</p>	<p>1 spoke to with the state police.</p> <p>2 Q Do you recall what barracks was the</p> <p>3 trooper that you spoke with?</p> <p>4 A It was outside of Philadelphia.</p> <p>5 Q Did you make any notes or record any type</p> <p>6 of medium, electronic or otherwise of the</p> <p>7 conversation?</p> <p>8 A No.</p> <p>9 Q What was the substance of the</p> <p>10 conversation?</p> <p>11 A I talked to the sergeant at the state</p> <p>12 police at the barracks outside of Philadelphia</p> <p>13 explaining to him that we had -- or Sergeant Adams</p> <p>14 had entered the individual's children into NCIC.</p> <p>15 And the children were listed as missing individuals,</p> <p>16 and we were assisting in the help of the state</p> <p>17 police for the safe return of those children back to</p> <p>18 Virginia.</p> <p>19 Q What made you think it was a sergeant from</p> <p>20 a state police facility outside of Philadelphia?</p> <p>21 A Because I think I asked him where they</p> <p>22 were located at.</p> <p>23 Q Did he say what the reason for the call</p> <p>24 was? Was he calling you to confirm something, or</p> <p>25 was he calling you to give you information?</p>
Page 6	Page 8
<p>1 A Well, I wasn't involved in the arrest of</p> <p>2 David Bush.</p> <p>3 Q Okay. Were you involved in the</p> <p>4 procurement of any warrants for him?</p> <p>5 A No.</p> <p>6 Q Were you involved in any discussions with</p> <p>7 the state police in regards to David Bush?</p> <p>8 A Which state police?</p> <p>9 Q Pennsylvania State Police.</p> <p>10 A I'm sorry. Can you repeat the question</p> <p>11 again.</p> <p>12 Q Did you have any discussions with anybody</p> <p>13 from the Pennsylvania State Police regarding David</p> <p>14 Bush's children or Ms. Bush?</p> <p>15 A Yes.</p> <p>16 Q Who did you speak with?</p> <p>17 A I don't remember.</p> <p>18 Q Do you remember a rank?</p> <p>19 A Sergeant.</p> <p>20 Q And if I told you the name "Tripp" would</p> <p>21 that refresh your memory?</p> <p>22 A It wasn't Tripp.</p> <p>23 Q If I told you "McDermott" does that help</p> <p>24 you?</p> <p>25 A I don't recall the name of the sergeant I</p>	<p>1 A He didn't call me.</p> <p>2 Q You called him?</p> <p>3 A That's correct.</p> <p>4 Q How did you know to call the barracks or</p> <p>5 the facility at the state police outside</p> <p>6 Philadelphia?</p> <p>7 A Because he knew the location of Mr. Bush's</p> <p>8 address.</p> <p>9 Q Oh, okay. If I told you Dublin?</p> <p>10 A I'm sorry?</p> <p>11 Q Dublin Barracks PSP? Pennsylvania State</p> <p>12 Police.</p> <p>13 A (Witness shakes head.)</p> <p>14 Q That doesn't refresh your memory?</p> <p>15 A No, sir; it doesn't.</p> <p>16 Q Okay. If I told you Trevoze, does that</p> <p>17 refresh your memory?</p> <p>18 A No.</p> <p>19 Q Okay. So you called him looking for David</p> <p>20 Bush?</p> <p>21 A No.</p> <p>22 Q You called the state police for what</p> <p>23 reason?</p> <p>24 A To assist us in retrieving the three</p> <p>25 children back to Virginia.</p>

Page 9	Page 11
<p>1 Q Okay. Under what authority were you</p> <p>2 looking to retrieve the children?</p> <p>3 A A court order issued by the Juvenile &</p> <p>4 Domestic Relation's Court of the City of Richmond.</p> <p>5 Q Okay. That's a civil lawyer; right?</p> <p>6 A It's a court order signed by a judge</p> <p>7 stating that Mr. Bush did not have legal custody of</p> <p>8 those children, and they were to be immediately</p> <p>9 returned to Ms. Bush.</p> <p>10 Q Okay. Was there any order that was ever</p> <p>11 provided to you that said Ms. Bush had legal custody</p> <p>12 of the children when she entered the Commonwealth of</p> <p>13 Virginia?</p> <p>14 A I don't understand the question.</p> <p>15 Q Sure. Did you have knowledge whether</p> <p>16 Ms. Bush was lawfully in Virginia with the children?</p> <p>17 A Once again, I don't know what time period</p> <p>18 you're talking about. I don't understand the</p> <p>19 question.</p> <p>20 Q At any time?</p> <p>21 A At any time did I know that Ms. Bush --</p> <p>22 Q At any time did you learn that Ms. Bush</p> <p>23 was in Virginia without a court order from</p> <p>24 Pennsylvania authorizing her to be in Virginia with</p> <p>25 the kids?</p>	<p>1 three pages, each double sided, each one identified</p> <p>2 Runaways/Missing Persons, Incident No. 2006</p> <p>3 10240027 -- what is that?</p> <p>4 A Appears to be 29 on that one.</p> <p>5 Q Okay.</p> <p>6 A That would be the one for Dominik Serene.</p> <p>7 Q And the other one looks like a date that's</p> <p>8 been modified. It's 0482?</p> <p>9 A No. That's the incident number. The date</p> <p>10 has not been modified.</p> <p>11 Q Not the date. The number.</p> <p>12 A Yes. The incident number has been</p> <p>13 modified to 0482, that's correct.</p> <p>14 Q Okay.</p> <p>15 A Also this report.</p> <p>16 Q This report being?</p> <p>17 A That's the incident date.</p> <p>18 Q For the purposes of the record Case No.</p> <p>19 20061014063. Seven pages?</p> <p>20 MR. SIMOPOULOS: I'd like to see that.</p> <p>21 MR. PURICELLI: (Document proffered.)</p> <p>22 MR. SIMOPOULOS: Look at all this.</p> <p>23 THE WITNESS: (Reviews documents.)</p> <p>24 Actually, the RPR report would only be three</p> <p>25 pages. It would be these three pages.</p>
Page 10	Page 12
<p>1 A No.</p> <p>2 Q What did you do, if anything, to find out</p> <p>3 if she was in Virginia with the kids lawfully?</p> <p>4 A I didn't. I had a court order from the</p> <p>5 City of Richmond that she produced by a judge</p> <p>6 stating that Mr. Bush was not to have custody of the</p> <p>7 children, and the children were to be immediately</p> <p>8 returned to Ms. Bush.</p> <p>9 Q Is that the first you had any knowledge of</p> <p>10 how the incident where David Bush retained custody</p> <p>11 of the children in Virginia and removed them?</p> <p>12 A I'm sorry. Repeat the question.</p> <p>13 Q Said another way, when was the first time</p> <p>14 you learned about David Bush coming to Virginia to</p> <p>15 pick up his children?</p> <p>16 A After the report was filed with the</p> <p>17 Richmond Police Department.</p> <p>18 Q What report?</p> <p>19 A It was an incident based report.</p> <p>20 Q I show you packet of documents marked</p> <p>21 Adams 1. Can you identify it? Is that the report</p> <p>22 (proffered) you're referring to?</p> <p>23 A (Reviews documents.) This is the report,</p> <p>24 yes. Runaway and Missing Person.</p> <p>25 Q For the purposes of the record, I have</p>	<p>1 MR. PURICELLI: Okay. Those three pages.</p> <p>2 MR. SIMOPOULOS: Maybe we can mark them in</p> <p>3 some other way so we now what we're referring</p> <p>4 to?</p> <p>5 MR. PURICELLI: I'm trying to do that now</p> <p>6 because we have them all in one packet of Adams</p> <p>7 1.</p> <p>8 MR. SIMOPOULOS: I'll just put like a</p> <p>9 little number at the bottom.</p> <p>10 MR. PURICELLI: All right. That's</p> <p>11 acceptable. We'll call it --</p> <p>12 MR. SIMOPOULOS: 1, 2 and 3.</p> <p>13 MR. PURICELLI: We've already got 1. How</p> <p>14 about we call it A,B,C.</p> <p>15 MR. SIMOPOULOS: All right.</p> <p>16 MR. PURICELLI: And we've designated in</p> <p>17 ink for Adams 1, three pages for an Incident</p> <p>18 Investigation Internal copy, three letters A, B</p> <p>19 and C in the lower right-hand corner. Is that</p> <p>20 correct; Counsel?</p> <p>21 MR. SIMOPOULOS: Yes.</p> <p>22 BY MR. PURICELLI:</p> <p>23 Q All right. Lieutenant, for the purposes</p> <p>24 of this record you've identified three</p> <p>25 Runaway/Missing Persons reports; correct?</p>

Page 13	Page 15
<p>1 A That's correct.</p> <p>2 Q One of them is circled; correct? Up in</p> <p>3 the upper right-hand corner?</p> <p>4 A (Reviews documents.) You're referring to</p> <p>5 Missing Person 90B?</p> <p>6 Q The only one of the three that's circled?</p> <p>7 A Correct.</p> <p>8 Q What does the circle indicate?</p> <p>9 A A missing person.</p> <p>10 Q Okay. And the other two are not circled.</p> <p>11 Is that for any particular reason?</p> <p>12 A I don't know.</p> <p>13 Q I assume, and correct me if I'm wrong,</p> <p>14 there are procedures within the Richmond Police</p> <p>15 Department about completing this form?</p> <p>16 A Correct.</p> <p>17 Q Would those procedures say whether or not</p> <p>18 a particular block on that form should or shouldn't</p> <p>19 be circled?</p> <p>20 A That's correct.</p> <p>21 Q What should it be? Circled or not</p> <p>22 circled?</p> <p>23 A They all, by the rule, should be circled</p> <p>24 in missing persons.</p> <p>25 Q Okay. So this is an over sight?</p>	<p>1 A I don't know.</p> <p>2 Q Do you have an approximation? Last year?</p> <p>3 A I don't know.</p> <p>4 Q Okay. Was he a member of any specialized</p> <p>5 unit to take that report?</p> <p>6 A No.</p> <p>7 Q Do you know how that report came to be</p> <p>8 prepared?</p> <p>9 A No.</p> <p>10 Q What was your position with the Richmond</p> <p>11 Police Department when that report was created?</p> <p>12 A The report was created October 24, 2006.</p> <p>13 I was Lieutenant in charge of Major Crimes Unit.</p> <p>14 Q And as Lieutenant of Major Crimes, who did</p> <p>15 you supervise?</p> <p>16 A I supervised Youth Services, the Fugitive</p> <p>17 Unit, Aggravated Assaults, the Sex Crime Unit, the</p> <p>18 Pawn Shop and Pawn Watch Unit and the Expediter</p> <p>19 which means the individual that screens reports.</p> <p>20 Q The expediter who screens reports also</p> <p>21 screen reports for persons determined to be missing?</p> <p>22 A No.</p> <p>23 Q No? Okay. Do they screen reports for</p> <p>24 that would concern abduction of children?</p> <p>25 A No.</p>
Page 14	Page 16
<p>1 A Okay. I didn't take the report.</p> <p>2 Q Who did?</p> <p>3 A Mark Segal.</p> <p>4 Q Mark Segal?</p> <p>5 A Uh-huh.</p> <p>6 Q Do you know Mark Segal?</p> <p>7 A Yes.</p> <p>8 Q Who is he?</p> <p>9 A He is now a Deputy with the Hanover County</p> <p>10 Sheriff's Office.</p> <p>11 Q When were the reports that we're looking</p> <p>12 at completed?</p> <p>13 A I stand corrected. The reports are filled</p> <p>14 out properly. When I flip over to page 1 all three</p> <p>15 reports are circled Missing Person 90B.</p> <p>16 Q Okay. So they're all a Missing Person</p> <p>17 Report?</p> <p>18 A Correct.</p> <p>19 Q At the time that he was preparing this</p> <p>20 report as indicated by the signature there in the</p> <p>21 block you're identifying for who filled it out, was</p> <p>22 he a member of the Richmond City Police Department?</p> <p>23 A Yes, he was.</p> <p>24 Q Okay. When did he leave the Richmond City</p> <p>25 Police Department?</p>	<p>1 Q Would it be fair for me to say that the</p> <p>2 person who reviews those reports as expediter would</p> <p>3 have nothing to do with looking at anything with the</p> <p>4 Bush case?</p> <p>5 A Correct.</p> <p>6 Q All right. Who was the person below you</p> <p>7 who would have supervised Youth Services?</p> <p>8 A It would have been Sergeant Sean Adams.</p> <p>9 Q Anybody below him that supervised lesser</p> <p>10 persons or subordinates of that unit?</p> <p>11 A No.</p> <p>12 Q How many people were in that unit in 2006</p> <p>13 on or about October 1 through December 1, 2006?</p> <p>14 A Eight.</p> <p>15 Q Would that be one sergeant for eight</p> <p>16 people or one sergeant for seven others?</p> <p>17 A It would have been one sergeant for eight</p> <p>18 detectives.</p> <p>19 Q So there would have been nine below you in</p> <p>20 that unit?</p> <p>21 A Correct.</p> <p>22 Q What were the duties for Sergeant Adams in</p> <p>23 regards to supervising the eight subordinates?</p> <p>24 A To oversee all the investigations that</p> <p>25 were assigned to the eight detectives he had working</p>

Page 17	Page 19
<p>1 for him at the time.</p> <p>2 Q Would he do the assignments to the eight</p> <p>3 detectives?</p> <p>4 A Yes.</p> <p>5 Q Okay. And how, under policy, is the</p> <p>6 assignment given to a detective?</p> <p>7 A Just a regular case that comes in?</p> <p>8 Q Yes. Say you get a phone call.</p> <p>9 A There's a procedure. Basically, the</p> <p>10 uniform officers fill out an incident based report</p> <p>11 similar to the one you have in front of you.</p> <p>12 Q Okay. The ones we marked A, B and C?</p> <p>13 A Correct. That goes electronically to the</p> <p>14 sergeant, their immediate supervisor which is the</p> <p>15 street sergeant. That sergeant will then approve</p> <p>16 that report or disapprove it and send it back for</p> <p>17 corrections. Once that sergeant approves that</p> <p>18 report it automatically gets sent to Youth Services</p> <p>19 for follow-up later.</p> <p>20 Q The reports that we have here, would there</p> <p>21 be any indication you can point me to as to whether</p> <p>22 or not a street sergeant reviewed this report?</p> <p>23 A Yes.</p> <p>24 Q Who was that street sergeant?</p> <p>25 A Sergeant Childress.</p>	<p>1 it's fine, he electronically forwards it?</p> <p>2 A Well, once the street sergeant approves</p> <p>3 it, it automatically gets forwarded to the</p> <p>4 respective division.</p> <p>5 Q What would be the criteria, if there is,</p> <p>6 for a missing child?</p> <p>7 A A missing child?</p> <p>8 Q Yes. Someone calls up and says, My child</p> <p>9 is missing. I assume the department has a criteria</p> <p>10 as to whether the report will fit a missing child's</p> <p>11 report or not?</p> <p>12 A Correct.</p> <p>13 Q What would be the criteria?</p> <p>14 A It depends on the age, number one.</p> <p>15 Q What would be the minimum age?</p> <p>16 A There's a different response for children</p> <p>17 ten and above and ten and under.</p> <p>18 Q Okay. What's the difference?</p> <p>19 A Anybody ten and under reported missing we</p> <p>20 actually set up an incident based command. Usually</p> <p>21 near the incident, where it occurred. If we do not</p> <p>22 know where -- if the child is not with somebody and</p> <p>23 is missing as in probably an abduction by a stranger</p> <p>24 that would be set up, reports would be filed. Youth</p> <p>25 Services and detectives would be assigned to that</p>
Page 18	Page 20
<p>1 Q Because his name appears on it does that</p> <p>2 mean he approved it?</p> <p>3 A Yes.</p> <p>4 Q And it would have been that sergeant who</p> <p>5 then had it electronically sent? Or would it just</p> <p>6 be returned to the patrol officer for that?</p> <p>7 A No. If there was something incorrect to</p> <p>8 the report the sergeant would send it back for</p> <p>9 correction before approving it.</p> <p>10 Q And then if everything was fine?</p> <p>11 A It would automatically be approved and</p> <p>12 would be automatically sent to Youth Services.</p> <p>13 Because it involves juveniles it automatically gets</p> <p>14 sent to Youth Services. Not immediately but four</p> <p>15 or five hours later for assignment for follow up by</p> <p>16 a detective if Sergeant Adams determined that was</p> <p>17 necessary.</p> <p>18 Q When the incident report's prepared is it</p> <p>19 prepared on a computer screen? Electronically it</p> <p>20 goes back and forth? Or is it actually printed out</p> <p>21 and sent that way?</p> <p>22 A No. It's zip drive.</p> <p>23 Q Oh, okay. So the officer takes the</p> <p>24 information in, stores it electronically, sends it</p> <p>25 to the sergeant who reviews it electronically. If</p>	<p>1 particular post, and then we'd start looking for the</p> <p>2 child after the report was filed.</p> <p>3 Q Okay. And I'll cut to the chase. You</p> <p>4 have a situation where the natural children of the</p> <p>5 father are removed from Virginia. And the natural</p> <p>6 mother is complaining about it. How does that fit</p> <p>7 into your missing child report?</p> <p>8 A Well, a report needs to be filed first.</p> <p>9 Q A missing child report?</p> <p>10 A Yes. Runaway missing person report needs</p> <p>11 to be filed. It needs to be taken by the officer.</p> <p>12 And if you look at the block, lower left-hand side.</p> <p>13 Q The one that has the following section</p> <p>14 must be completed and signed?</p> <p>15 A Right. And it needs to be signed off by</p> <p>16 the guardian of that individual.</p> <p>17 Q All right. This is certifying the person</p> <p>18 missing is under 18?</p> <p>19 A Uh-huh.</p> <p>20 Q Information being provided to the officer</p> <p>21 is true and correct to the best of their</p> <p>22 information. Correct? I'm paraphrasing.</p> <p>23 A You're asking a question?</p> <p>24 Q Yes. Am I paraphrasing that correctly?</p> <p>25 MR. SIMOPOULOS: Document speaks for</p>

Page 21	Page 23
<p>1 itself.</p> <p>2 MR. PURICELLI: I just want to make sure I</p> <p>3 understand it. That's all.</p> <p>4 BY MR. PURICELLI:</p> <p>5 Q Authorizing law enforcement to use</p> <p>6 photographs and other identifying information in</p> <p>7 attempt to locate the person being reported missing?</p> <p>8 A Yes. It says, I authorize any law</p> <p>9 enforcement official to use photographs and/or other</p> <p>10 identifying information that I have provided in any</p> <p>11 manner they deem necessary in attempting to locate</p> <p>12 the person I am reporting missing.</p> <p>13 Q And the last one simply says, the parent</p> <p>14 or legal guardian of person reported missing?</p> <p>15 A I represent that I am the natural parent</p> <p>16 or legal guardian of the person named in this report</p> <p>17 and have the legal right to sign this authorization</p> <p>18 and consent.</p> <p>19 Q What would constitute legal guardianship?</p> <p>20 A Mother, father, grandmother that has been</p> <p>21 appointed by the Court as a guardian, guardian ad</p> <p>22 litem.</p> <p>23 Q And a parent is obvious?</p> <p>24 A (Nods.)</p> <p>25 Q And they have what appear to be initials</p>	<p>1 who they're with; is that correct?</p> <p>2 A No. It's a missing person report. It</p> <p>3 could be that the person is just missing. We get a</p> <p>4 lot of missing person reports that they haven't seen</p> <p>5 the child or the individual. Everybody has a right</p> <p>6 based on facts and circumstances surrounding this to</p> <p>7 file a missing person report if they believe that</p> <p>8 the person is missing.</p> <p>9 Q What do you at the department classify as</p> <p>10 a person missing?</p> <p>11 A Somebody that hasn't been seen in three</p> <p>12 hours, there's unusual circumstances that they</p> <p>13 haven't been seen. Each case is different. We have</p> <p>14 to look at them on a case to case basis.</p> <p>15 Q How about if the person reporting a child</p> <p>16 missing knows that the child has been turned over to</p> <p>17 the natural father by the police? Does that mean</p> <p>18 the child's missing by Richmond Police Department's</p> <p>19 policy?</p> <p>20 A If the individual that signs this that</p> <p>21 actually reports the child missing knows that, that</p> <p>22 would be a different circumstance.</p> <p>23 Q What circumstance would it be?</p> <p>24 A I think it would probably raise to the</p> <p>25 level of further investigation would need to be done</p>
Page 22	Page 24
<p>1 in the upper right-hand corner. Do you know what</p> <p>2 those are?</p> <p>3 A I can read them. It says, Okay, per M.K.</p> <p>4 Segal.</p> <p>5 Q So they're actually a note. That's not an</p> <p>6 okay for some of these names. It's an actual word?</p> <p>7 A I have no idea. I did not complete that.</p> <p>8 Q Is it usual for something to be in that</p> <p>9 block according to the policies of the department?</p> <p>10 A I don't know.</p> <p>11 Q You were the person who supervised</p> <p>12 ultimately these documents; weren't you?</p> <p>13 A No.</p> <p>14 Q Who would have been?</p> <p>15 A These documents were taken by Mark Segal</p> <p>16 and put on file with the Youth and Services Unit</p> <p>17 per state law.</p> <p>18 Q Who would have supervised to see that they</p> <p>19 were completed according to department policy?</p> <p>20 A Sergeant Adams.</p> <p>21 Q So you never would have been involved at</p> <p>22 that level of supervision?</p> <p>23 A No.</p> <p>24 Q All right. Now, this report's filed for a</p> <p>25 person that you don't know where that person is or</p>	<p>1 by the Youth Services Detective to follow up.</p> <p>2 Q Well, Sergeant Adams would have to</p> <p>3 supervise this form; wouldn't he?</p> <p>4 A I think he would have seen it, yes. These</p> <p>5 are forms filled out by requirement of state police.</p> <p>6 This on the other hand would create follow up.</p> <p>7 Q I understand. I just want to stick with</p> <p>8 this right now.</p> <p>9 A Okay.</p> <p>10 Q I want to know what the department's need</p> <p>11 was for filling out this missing child form when the</p> <p>12 child has been picked up by the police, the same</p> <p>13 police filling out the form, and turns it over to</p> <p>14 the natural father, and the child is reported</p> <p>15 missing and is leaving with the father and there's a</p> <p>16 whole police report on it?</p> <p>17 MR. SIMOPOULOS: Calls for speculation and</p> <p>18 objection.</p> <p>19 MR. PURICELLI: You can answer the</p> <p>20 question.</p> <p>21 MR. SIMOPOULOS: Answer if you can.</p> <p>22 THE WITNESS: I don't know exactly what</p> <p>23 you're trying to ask me.</p> <p>24 BY MR. PURICELLI:</p> <p>25 Q I'm asking how it is that you have a</p>